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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEVEN ARTHUR LANKFORD,
GLEN LOUIS COZART,
MAX SAMUEL BENNETT TURBETT, and
MATTHEW PHILLIP HART,

Defendants.

No. 8:24-CR-00077 (A) -WLH

STIPULATION REGARDING REQUEST FOR
(1) CONTINUANCE OF TRIAL DATE AND
(2) FINDINGS OF EXCLUDABLE TIME
PERIODS PURSUANT TO SPEEDY TRIAL
ACT

CURRENT FPTC DATE: 09/19/25

CURRENT TRIAL DATE: 09/29/25

PROPOSED FPTC DATE: 04/10/26

PROPOSED TRIAL DATE: 04/20/26

Plaintiff United States of America, by and through its counsel
of record, the United States Attorney for the Central District of
California and Assistant United States Attorney Cassie D. Palmer, and
defendants STEVEN ARTHUR LANKFORD, GLEN LOUIS COZART, MAX SAMUEL
BENNETT TURBETT, and MATTHEW PHILLIP HART, both individually and by
and through their respective counsel of record, hereby stipulate as
follows:

1 1. The Indictment in this case was filed on June 23, 2024.
2 The First Superseding Indictment ("FSI") in this case was filed on
3 August 1, 2024. The defendants first appeared before a judicial
4 officer of the court in which the charges in this case were pending
5 on August 12, 2024. The Speedy Trial Act, 18 U.S.C. § 3161,
6 originally required that the trial commence on or before October 21,
7 2024.

8 2. On August 12, 2024, at the defendants' arraignment, the
9 Court set a trial date of October 7, 2024 and final pretrial
10 conference date of September 27, 2024.

11 3. Pursuant to the parties Speedy Trial Stipulation (Dkt. No.
12 84), the Court previously continued the trial to September 29, 2025
13 and the final pretrial conference to September 19, 2025. (Dkt. No.
14 85.)

15 4. Defendants are released on bond pending trial. The
16 government estimates that its case-in-chief, including estimated
17 cross examination, in this matter will last approximately ten to
18 fifteen trial days. At this juncture, the defendants have not
19 determined whether they will present a defense and, if so, how long
20 their case(s) will take. All defendants are joined for trial and a
21 severance has not been requested or granted.

22 5. By this stipulation, the parties move to continue the trial
23 date to April 20, 2026 and the final pretrial conference to
24 conference ("FPTC") to April 10, 2026. This is the second request
25 for a continuance.

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6. The parties jointly request that the Court set the following additional dates (with the hearing/court dates appearing in **bold**) :

Event	Proposed Date
<u>SUBSTANTIVE MOTIONS (CIPA) :</u>	
Substantive Motions, including United States' Classified Information Procedures Act, 18 U.S.C. Appendix III ("CIPA") Section 4 Submissions ¹	09/19/2025
Responses to Substantive Motions	10/17/2025
Replies to Substantive Motions (Optional)	10/31/2025
Hearing on Substantive Motions (If Needed)	11/21/2025
<u>PRETRIAL MOTIONS:²</u>	
Pretrial Motions (<u>e.g.</u> , to Dismiss Indictment, Sever, Compel, Suppress)	11/21/2025
Oppositions to Pretrial Motions	12/19/2025
Replies to Pretrial Motions (Optional)	01/09/2026
Hearing on Pretrial Motions	01/30/2026
<u>TRIAL-RELATED DEADLINES</u>	
Gov't Initial Exhibit List to Defense	02/02/2026
Gov't Charts & Summaries to Defense	02/02/2026
Meet and Confer re MILS	02/09/2026
MILs Filing	02/27/2026
Gov't Proposed Jury Instructions and Verdict Form to Defense	03/06/2026
MILs Oppositions	03/13/2026
MILs Replies	03/20/2026
Defense Responses to Gov't Exhibit List, Jury Instructions, and Verdict Form to Gov't	03/20/2026
Gov't Transcripts and Translations to Defense	03/20/2026
Expert Offers of Proof	04/03/2026

¹ Any materials produced pursuant to CIPA shall not be subject to any other discovery deadlines.

² These motions will be filed on or before these dates. The parties agree that any motions filed earlier than these dates will be subject to the same briefing schedule set forth herein unless otherwise agreed upon by the parties, that is, the motions will be filed nine weeks before the hearing date, oppositions are due five weeks before the hearing date, replies are due three weeks before the hearing date.

Event	Proposed Date
Gov't Exhibit List w/ Defense Objections	04/03/2026
Gov't Witness List	04/03/2026
Joint Proposed Jury Instructions	04/03/2026
Joint Proposed Verdict Form	04/03/2026
Joint Statement of Case	04/03/2026
Proposed Voir Dire	04/03/2026
Joint Case-Specific Glossary	04/03/2026
Gov't Trial Brief	04/03/2026
Final Pretrial Conference	04/10/2026
Defense Charts & Summaries to Gov't	04/06/2026
Defense Exhibit List and Witness List to Gov't	04/06/2026
Defense Exhibit List with Gov't Objections to Defense	04/13/2026
Defense Witness List and Exhibit List	04/17/2026
Gov't Amended Exhibit List and Witness List (If Any)	04/17/2026 at noon
Trial Date	04/20/2026

7. The parties jointly request the continuance based upon the following facts, which the parties believe demonstrate good cause to support the appropriate findings under the Speedy Trial Act:

a. Defendants are charged in the FSI with violations of 18 U.S.C. § 1951(a): Conspiracy to Commit Extortion; 18 U.S.C. § 1951(a): Attempted Extortion; 18 U.S.C. § 241: Conspiracy Against Rights; and 18 U.S.C. § 242: Deprivation of Rights Under Color of Law.

b. The government has produced discovery to the defense, including approximately 16,000 Bates numbered pages and items, some of which will take a significant time for defense counsel to process, including recordings, transcripts, videos, financial documents, and documents in foreign languages. The government anticipates producing

1 additional discovery to defendants, including items that have
2 recently undergone filter procedures. Defendants provided the
3 government with two detailed lists of specific discovery requests,
4 and the parties have met and conferred regarding those requests and
5 will continue to do so. The government anticipates making additional
6 productions to defendants, including via the Classified Information
7 Procedures Act.

8 c. The government has given notice of its intent to
9 introduce certain evidence under Federal Rule of Evidence 404(b).
10 One of the items of potential 404(b) evidence concerns defendant
11 LANKFORD's actions in 2019. Defense counsel needs time to conduct an
12 independent investigation of that evidence, and its admissibility
13 likely will require motion practice.

14 d. Several defendants, as well as some of the victims
15 alleged in the FSI, gave depositions in a civil case. The parties
16 need to determine what passages of those depositions, if any, are
17 admissible, and if any additional portions of the statements should
18 be introduced under Federal Rule of Evidence 106. This will require
19 significant time and may require motion practice.

20 e. Some documents produced in this matter are in the
21 Chinese language. Some of those documents have been translated, but
22 defendants need to review and verify those translations. Other
23 documents in Chinese have not been translated, and the parties will
24 need to translate those documents if they intend to use them as
25 exhibits at trial. Ultimately, the parties will attempt to agree on
26 the translations for any documents they intend to use as trial
27 exhibits; if there are disagreements, however, the parties may need
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1 to prepare their respective foreign language interpreters as experts
2 to testify at trial and engage in motion practice.

3 f. Defendants anticipate the possibility of filing
4 motions to sever on several grounds. One ground for severance -- a
5 motion pursuant to Bruton v. United States, 391 U.S. 123 (1968) --
6 depends upon the government identifying which of defendants'
7 statements it intends to introduce at trial at which time defendants
8 will evaluate the admissibility of such statements and whether a
9 severance motion is appropriate under Bruton.

10 g. On April 8, 2025, the government filed a Motion under
11 18 U.S.C. App. 3, § 2 to Designate a Classified Information Security
12 Officer in this case and notifying the Court that the United States
13 will invoke the Classified Information Procedures Act ("CIPA"),
14 18 U.S.C. App. 3, in this case. (Dkt. No. 98.) The Court granted
15 that Motion on April 10, 2025. (Dkt. No. 100.) Despite diligent
16 efforts and preparation on the government's part, the government
17 anticipates needing additional time to complete its review of any
18 materials underlying the CIPA filing, obtaining the necessary
19 approval(s) relating to the CIPA filings, and drafting the CIPA
20 filing.

21 h. Due to the nature of the prosecution, the number of
22 defendants, and the existence of novel questions of fact or law,
23 including the charges in the FSI, the need for time to accommodate
24 CIPA procedures, possible foreign depositions, the amount of
25 discovery produced to defendants, and other pretrial issues that may
26 need to be litigated, this case is so unusual and so complex that it
27 is unreasonable to expect adequate preparation for pretrial
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1 proceedings or for the trial itself within the Speedy Trial Act time
2 limits.

3 i. Several potential percipient defense witnesses are
4 located in foreign countries, including China. Defendants anticipate
5 requesting foreign depositions, which the government anticipates
6 opposing. That said, the parties would time to meet and confer
7 further and litigate the issue with the Court. If granted, the
8 depositions will have to be coordinated with all counsels' schedules,
9 as well as the U.S. State Department and other government agencies,
10 here and abroad. Defense counsel anticipates that the scheduling,
11 coordination, and taking of foreign depositions may require a
12 significant time commitment.

13 j. Defense counsel for the following defendants also
14 anticipate needing to expend time to prepare for the following
15 matters:

16 i. Counsel for defendant COZART, Marilyn E.
17 Bednarski, presently is scheduled to be in the following trials: (1)
18 Richards v. County of San Bernardino et al., CV-17-497-HDV, a civil
19 rights trial for a plaintiff who alleges he was wrongfully convicted
20 and imprisonment set for for June 25, 2025, and estimated to last ten
21 days; case was filed on March 16, 2017; multiple continuances have been
22 granted; case is ready for trial; summary judgment motions were
23 decided, appealed, and multiple causes of action remanded for trial;
24 current trial date is very likely trial date; and (2) United States
25 v. Lu, CR-23-95-FMO-4, a four-defendant conspiracy to commit wire
26 fraud trial set for on October 21, 2025, and estimated to last two
27 weeks; indictment was filed on March 2, 2023; discovery is
28 voluminous; five continuances previously have been granted; trial is

1 likely to proceed on current date. Accordingly, counsel represents
2 that she will not have the time that she believes is necessary to
3 prepare to try this case on the current trial date.

4 ii. Counsel for defendant TURBETT, Craig Wilke,
5 presently is scheduled to be in the following trials: (1) United
6 States v. Gong, CR-24-127-JFW, a single-defendant theft of trade
7 secrets and false statements trial set for June 24, 2025 and
8 estimated to last eight days; the indictment was filed on February
9 27, 2024; the case is complex due to the volume and nature of
10 discovery; two continuances have been granted; the parties expect one
11 additional continuance to be granted; the case is not expected to
12 proceed to trial on the current trial date; and (2) United States v.
13 Mecina, et al., CR-8:24-22-JWH, a single defendant conspiracy to
14 distribute and possess with intent to distribute methamphetamine,
15 distribution of methamphetamine near a school, and distribution of
16 methamphetamine, set for trial on August 25, 2025 and estimated to
17 last four days; the indictment was filed on February 24, 2024; two
18 prior continuances have been granted; no future continuance will
19 likely be requested; case is expected to proceed to trial on current
20 date. Accordingly, counsel represents that he will not have the time
21 that he believes is necessary to prepare to try this case on the
22 current trial date.

23 iii. Counsel for defendant HART, Anthony M. Solis,
24 presently is scheduled to be in the following trials: (1) United
25 States v. Corral, et al. (Sylvia Martinez), CR-25-213-ODW, a four-
26 defendant armed multiple-count Hobbs Act robbery trial currently set
27 for May 27, 2025 and estimated to last five days; the indictment was
28 filed on March 27, 2025; there have been no prior continuances and a

1 further continuance is being contemplated; the parties are not ready
2 for trial; the trial will likely be continued; (2) United States v.
3 Pierce, CR-24-567-SB, a conspiracy to commit wire fraud and
4 aggravated identity theft trial currently set for August 18, 2025 and
5 estimated to last five days; the indictment was filed on September
6 24, 2024; there has been one prior continuance; a further continuance
7 is not likely, and trial will likely proceed on the current date if
8 not resolved; (3) United States v. Bland, et al. (Abigail Luckey),
9 CR-24-344-JAK-3, a three-defendant armed multiple-count Hobbs Act
10 robbery case trial currently set for September 2, 2025 and estimated
11 to last five days; the indictment was filed on June 4, 2024; there
12 have been no prior continuances; the parties are not ready for trial;
13 a further continuance is being contemplated, and trial likely will be
14 continued to September 2025; (4) United States v. American Premium
15 Water Corporation, et al., CR-1:23-144-JPC (ND-OH), a six-defendant
16 conspiracy to commit securities fraud trial currently set for
17 September 15, 2025 and estimated to last seven days; the indictment
18 was filed March 8, 2023; there have been multiple status conferences
19 and trial was recently set; a further continuance is not being
20 contemplated, and the trial will likely proceed in September 2025;
21 (5) United States v. Laredo, et al., CR-18-892-AB, a 26-defendant
22 RICO/VICAR trial currently set for October 21, 2025 and estimated to
23 last 15 days; the indictment was filed June 4, 2024; there have been
24 multiple prior continuances; a further continuance is not
25 contemplated, and trial will likely proceed in October 2025; and
26 (6) United States v. Hurtado, et al., CR-23-545-AB, a multi-defendant
27 (30 defendants) RICO/VICAR trial currently set for November 17, 2025
28 and estimated to last 10 days; the indictment was filed on November

1 8, 2023; there have been two prior continuances; the parties are not
2 ready for trial, and a further continuance is not anticipated.
3 Accordingly, counsel represents that he will not have the time that
4 he believes is necessary to prepare to try this case on the current
5 trial date.

6 k. In light of the foregoing, counsel for defendants also
7 represent that additional time is necessary to confer with
8 defendants, conduct and complete an independent investigation of the
9 case, conduct and complete additional legal research including for
10 potential pretrial motions, review the discovery and potential
11 evidence in the case, and prepare for trial in the event that a
12 pretrial resolution does not occur. Defense counsel represent that
13 failure to grant the continuance would deny them reasonable time
14 necessary for effective preparation, taking into account the exercise
15 of due diligence.

16 l. Defendants believe that failure to grant the
17 continuance will deny them continuity of counsel and adequate
18 representation.

19 m. The government joins in the request for a continuance.

20 n. The requested continuance is not based on congestion
21 of the Court's calendar, lack of diligent preparation on the part of
22 the attorney for the government or the defense, or failure on the
23 part of the attorney for the Government to obtain available
24 witnesses.

25 8. For purposes of computing the date under the Speedy Trial
26 Act by which defendant's trial must commence, the parties agree that
27 the time period of September 29, 2025 to April 20, 2026, inclusive,
28 should be excluded pursuant to 18 U.S.C. §§ 3161(h) (7) (A),

(h) (7) (B) (i), (h) (7) (B) (ii) (h) (7) (B) (iv), (h) (6), because the delay results from a continuance granted by the Court at defendant's request, without government objection, on the basis of the Court's finding that: (i) the ends of justice served by the continuance outweigh the best interest of the public and defendant in a speedy trial; (ii) failure to grant the continuance would be likely to make a continuation of the proceeding impossible, or result in a miscarriage of justice; (iii) the case is so unusual and so complex, due to the nature of the prosecution, the number of defendants, and the existence of novel questions of fact or law, that it is unreasonable to expect preparation for pretrial proceedings or for the trial itself within the time limits established by the Speedy Trial Act; and (iv) failure to grant the continuance would unreasonably deny defendant continuity of counsel and would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

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1 9. Nothing in this stipulation shall preclude a finding that
2 other provisions of the Speedy Trial Act dictate that additional time
3 periods be excluded from the period within which trial must commence.
4 Moreover, the same provisions and/or other provisions of the Speedy
5 Trial Act may in the future authorize the exclusion of additional
6 time periods from the period within which trial must commence.

7 IT IS SO STIPULATED.

8 Dated: April 22, 2024

Respectfully submitted,

9 BILAL A. ESSAYLI
10 United States Attorney

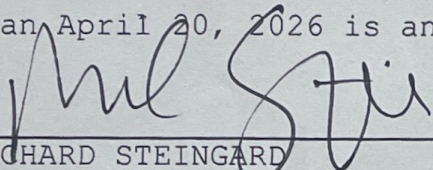
11 LINDSEY GREER DOTSON
12 Assistant United States Attorney
13 Chief, Criminal Division



14 CASSIE D. PALMER
15 Assistant United States Attorney

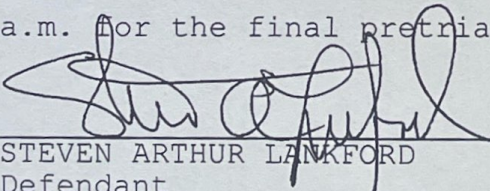
16 Attorneys for Plaintiff
17 UNITED STATES OF AMERICA
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1 I am defendant STEVEN ARTHUR LANKFORD's attorney. I have
2 carefully discussed every part of this stipulation and the
3 continuance of the trial date with my client. I have fully informed
4 my client of his Speedy Trial rights. To my knowledge, my client
5 understands those rights and agrees to waive them. I believe that my
6 client's decision to give up the right to be brought to trial earlier
7 than April 20, 2026 is an informed and voluntary one.

8 
9 RICHARD STEINGARD
10 Attorney for Defendant
STEVEN ARTHUR LANKFORD


4/28/25
Date

11
12 I have read this stipulation and have carefully discussed it
13 with my attorney. I understand my Speedy Trial rights. I
14 voluntarily agree to the continuance of the trial date, and give up
15 my right to be brought to trial earlier than April 20, 2026. I
16 understand that I will be ordered to appear in Courtroom 9B of the
17 Federal Courthouse, 350 W. 1st Street, Los Angeles, California on
18 April 20, 2026 at 9:00 a.m. for trial and on April 10, 2026 at 9:30
19 a.m. for the final pretrial conference.

20 
21 STEVEN ARTHUR LANKFORD
22 Defendant

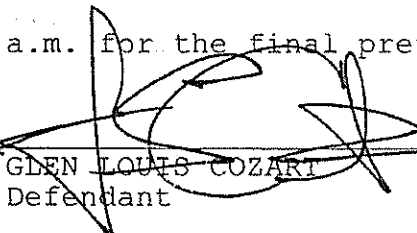
04-25-2025
Date

1 I am defendant GLEN LOUIS COZART's attorney. I have carefully
2 discussed every part of this stipulation and the continuance of the
3 trial date with my client. I have fully informed my client of his
4 Speedy Trial rights. To my knowledge, my client understands those
5 rights and agrees to waive them. I believe that my client's decision
6 to give up the right to be brought to trial earlier than April 20,
7 2026 is an informed and voluntary one.

8 
9 MARILYN E. BEDNARKSI
10 Attorney for Defendant
11 GLEN LOUIS COZART

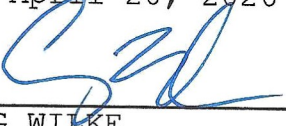
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19 a.m. for the final pretrial conference.

20 
21 GLEN LOUIS COZART
22 Defendant

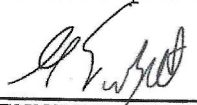
4-28-2025
Date

1 I am defendant MAX SAMUEL BENNETT TURBETT's attorney. I have
2 carefully discussed every part of this stipulation and the
3 continuance of the trial date with my client. I have fully informed
4 my client of his Speedy Trial rights. To my knowledge, my client
5 understands those rights and agrees to waive them. I believe that my
6 client's decision to give up the right to be brought to trial earlier
7 than April 20, 2026 is an informed and voluntary one.

8 
9 CRAIG WILKE
10 Attorney for Defendant
11 MAX SAMUEL BENNETT TURBETT

4/29/25
Date

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18 April 20, 2026 at 9:00 a.m. for trial and on April 10, 2026 at 9:30
19 a.m. for the final pretrial conference.

20 
21 MAX SAMUEL BENNETT TURBETT
22 Defendant

4/29/25
Date

1 I am defendant MATTHEW PHILLIP HART's attorney. I have
2 carefully discussed every part of this stipulation and the
3 continuance of the trial date with my client. I have fully informed
4 my client of his Speedy Trial rights. To my knowledge, my client
5 understands those rights and agrees to waive them. I believe that my
6 client's decision to give up the right to be brought to trial earlier
7 than April 20, 2026 is an informed and voluntary one.

8 Anthony M. Solis
9 ANTHONY M. SOLIS
10 Attorney for Defendant
11 MATTHEW PHILLIP HART
12

4-25-2025
Date

13 I have read this stipulation and have carefully discussed it
14 with my attorney. I understand my Speedy Trial rights. I
15 voluntarily agree to the continuance of the trial date, and give up
16 my right to be brought to trial earlier than April 20, 2026. I
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21 
22 MATTHEW PHILLIP HART
23 Defendant
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24 April 2025
Date